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July 8, 2004

The Honorable Bruce Duke
Executive Director
Public Service Commission of SC
Post Office Drawer 11649
Columbia, South Carolina 29211

Re: Application of BellSouth Telecommunications, Inc. to Provide In-Region
InterLATA Services Pursuant to Section 271 of the Telecommunications Act of
1996
Docket No. 2001-209-C

Dear Mr. Duke:

Enclosed for filing are the original and 15 copies of BellSouth Telecommunications, Inc.'s ("BellSouth's") performance data change Notification Reports for August 2004 and preliminary September 2004. These data change Notification Reports are being provided to inform the Commission of the changes BellSouth plans to make to its Performance Measures Analysis Platform ("PMAP") with August data, and previews the changes BellSouth is considering making for September data. A Data Disclosure Report for July 2004 would be filed at this time as well, if needed; however, for July 2004 there are no additional South Carolina validated data issues to be disclosed that affect performance measurement calculations for which a fix has not yet been scheduled.

There is one additional item that BellSouth would like to bring to the attention of the Commission and the parties. In its April 2004 Data Notification filed on April 28, 2004, BellSouth provided notice of reporting a single data set for those CLECs with multiple OCNs. This change, which was Item No. 7 on the Proposed April 2004 Data

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Notification, was not implemented completely. BellSouth will make additional changes with May 2004 data to correct this problem.

Sincerely,

A handwritten signature in black ink, appearing to read "Patrick W. Turner". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Patrick W. Turner

PWT/nml
Enclosure
cc: All Parties of Record
PC Docs # 543486

PROPOSED AUGUST 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the August 2004 data month. Results for the August 2004 data month will be posted as follows:

Preliminary results September 20, 2004
Final results September 30, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O-11

Description of Change: Currently, for LSRs processed by COG, PMAP is counting fatal reject notices as LSRs with no response. BellSouth only has a record of the fatal reject notice, not the LSR that generated it. Since these notices are not LSRs, they should not be reflected in this measure consistent with the SQM. BellSouth proposes to discontinue counting fatal reject notices in the denominator of this measure. This proposed change was Item (1) on the Preliminary August Data Notification filed on June 1, 2004. (RQ5226)

Impact of Change: Regionwide, for March 2004, 22 fatal reject notices were incorrectly counted in the denominator of this measure.

(2) *Affected Measures:* O-12 (North Carolina only)

Description of Change: Currently, the column labeled CLEC Calls Abandoned on the statewide aggregate report incorrectly reflects the number of retail calls abandoned. BellSouth proposes to correct this problem. This proposed change was Item (3) on the Preliminary August Data Notification filed on June 1, 2004. (RQ5295)

Impact of Change: None.

(3) *Affected Measures:* O-3 & O-4

Description of Change: Currently, certain LSRs originated via ELMS6 map are being erroneously counted as “planned manual” fallout on the LNP Flow-Through report because of a difference in the text of an audit message between TCIF9 and ELMS6. BellSouth proposes to correct the Flow-Through code to look for the new text. (RQ5427)

Impact of Change: For April, 2004, 1252 additional EDI LSRs would have been counted, changing the overall LNP Flow-Thru percentage from 96.58% to 96.29%.

Provisioning Measurements

(4) *Affected Measures:* P-7 & P-7A

Description of Change: Currently, BellSouth is not excluding orders that have CLEC caused delays from these measures as required by the SQM. However, BellSouth is excluding orders that have been identified internally as being in jeopardy of missed due dates, regardless of whether the date was actually missed. BellSouth proposes to correct these problems. This proposed change was Item (4) on the Preliminary August Data Notification filed on June 1, 2004. (RQ5104)

Impact of Change: For January 2004, in Georgia, there would be no change to the P-7 measure. For P-7A, there would be an addition of 19 orders. However, the metric would remain 100% after the implementation of this change.

(5) *Affected Measures:* P-1

Description of Change: Currently, all statewide aggregate and 12-month Held Order Interval reports incorrectly disaggregate held orders by appointment reason, either as Equipment, Facilities or Other. This disaggregation is only required on the CLEC Specific reports. Consistent with the SQM, BellSouth proposes to remove the appointment reasons from the Aggregate and 12 month reports. This proposed change was Item (5) on the Preliminary August Data Notification filed on June 1, 2004. (RQ5208)

Impact of Change: The Aggregate and 12 month reports will no longer be disaggregated by appointment reason.

PRELIMINARY SEPTEMBER 2004 DATA NOTIFICATION

BellSouth is considering making the changes described in this document to generate results for the September 2004 data month. Results for the September 2004 data month will be posted as follows:

Preliminary results	October 20, 2004
Final results	October 31, 2004

BellSouth provides Data Notifications each month in compliance with the Georgia Public Service Commission's Order of July 19, 2002. This order specifies that when BellSouth proposes making any changes to the methods by which performance data is calculated, it must provide written notice. This notice must be provided on the first business day of the month before the data month in which the change will be made. BellSouth must also provide notification if it is considering making changes to the method of calculating data for the following month.

The "Affected Measures" described in this notice are those set forth in the Georgia Service Quality Measurement (SQM) Plan, unless otherwise noted. All "Impact of Change" descriptions are stated at the measurement level, unless the sub-metric level is specified.

Ordering Measurements

(1) *Affected Measures:* O7 & O-11

Description of Change: Currently, a CLEC is allowed to send a new LSR without changing the company code, PON and version to replace an LSR that was fatally rejected. BellSouth is using the date and time of the receipt of the fatal reject to determine the report period of the LSR instead of the date and time of the receipt of the corrected LSR. In addition, in some cases Bellsouth is using the date and time of the receipt of the latest version of the LSR instead of the actual version being measured. BellSouth proposes to correct this problem by utilizing the last date and time received for each version of the LSR for these measures. (RQ5467)

Impact of Change: For May 2004 data, the O-11 Partial-Mechanized denominator would decrease by 3 records and the result would increase by .01%. Fully Mechanized results would increase by .11% with a decrease of 10 records from the denominator. For manual results, a total of 52 records would be removed from the denominator, which would cause a .95% increase in the result.

Provisioning Measurements

(2) *Affected Measures:* P-1 (Florida only)

Description of Change: Currently, CLEC data for EELs are not being reported in the Florida Held Order Interval Report because the code is not designed to identify Florida orders for this sub-metric. BellSouth proposes to correct this problem. (RQ5317)

Impact of Change: For March 2004, there were 6 held orders for EELs averaging 9.6 days.

- (3) *Affected Measures:* P-5 (All States)
P-2A (Florida, Georgia, Kentucky, and Tennessee)
P-2B (Florida, Georgia, Kentucky, South Carolina, and Tennessee)
P-2 & P-10 (Alabama, Louisiana, Mississippi, North Carolina, and South Carolina)
P-8 (Louisiana)
P-9 (North Carolina)

Description of Change: Currently, conversion orders associated with denial and restoral activities that are created to permit a CLEC to acquire a customer whose service has been denied by BellSouth are being counted as Non-Mechanized orders. BellSouth proposes to classify the orders as Mechanized when they result from a mechanized LSR. (RQ5419)

Impact of Change: For April 2004, ACNI in Tennessee for UNE-P would increase from 95.94% to 95.96%. For Non-Mechanized, UNE-P would decrease from 26% to 22.9%

- (4) *Affected Measures:* P-11 (Florida, Georgia, Kentucky and Tennessee)

Description of Change: Currently, the data used to calculate the mechanized SOA only includes orders where both provisioning completion and final completion through billing occur in the same month. This measure should include all orders where provisioning is completed in the reporting period regardless of when final completion through billing occurs. BellSouth proposes to correct this problem. (RQ5430)

Impact of Change: For April 2004, the regional UNE results would change from 96.32% to 96.78%. For the same period, Resale would change from 96.22% to 98.91% and UNE-P would change from 96.44% to 96.22%.

- (5) *Affected Measures:* P-13B

Description of Change: Currently, when an LSR generates multiple trigger orders, PMAP assigns the date that the last trigger order was completed as the completion date for all telephone numbers on the LSR. BellSouth proposes to use the date that each trigger order was completed as the completion date for all telephone numbers on that order. (RQ5431)

Impact of Change: BellSouth's performance was understated by approximately 1.5%.

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Billing Measurements

- (6) *Affected Measures:* B-10 (Florida, Georgia, Kentucky, North Carolina and Tennessee)

Description of Change: The Billing Disputes and Adjustments Tracking System (BDATS) recently began assigning a negative sign to the value of a few adjustments. These appear to be corrupt records to PMAP so they are not reflected in the data. The records are valid and should not have the negative sign. The source system has been corrected, but as a precaution BellSouth proposes to change the PMAP code to capture such records should this condition reoccur. (RQ5387)

Impact of Change: For April 2004, in Florida, three of 792 (0.11%) records from BDATS reflected negative adjustment amounts.

Collocation Measurements

- (7) *Affected Measures:* C-2 (Florida and Tennessee only)

Description of Change: BellSouth proposes to correct the benchmark for C-2 – Virtual Augment – Without Additional Space from 45 Calendar Days to 60 Calendar Days as required by the SQM. (RQ5330)

Impact of Change: For May 2004, the reported Virtual Augment would have been within the benchmark.

- (8) *Affected Measures:* C-3 (Florida and Tennessee only)

Description of Change: BellSouth proposes to change from 2 levels of disaggregation to 6 levels of disaggregation consistent with the SQM. (RQ5331)

Impact of Change: For May 2004, there would be no change to the overall results as there were no missed due dates.

Special Access Measurements

- (9) *Affected Measures:* SA-2 (Florida and Georgia only)

Description of Change: Currently, BSLD data is not displayed on the Aggregate Reports. BellSouth proposed to display the BSLD column for Florida and Georgia. (RQ5335)

Impact of Change: None.

(10) *Affected Measures:* SA-3 (Tennessee only)

Description of Change: Currently, the Tennessee Aggregate Special Access Offered vs. Requested Due Date - Distribution report is not being populated. BellSouth proposes to display the data for the Tennessee Aggregate Special Access Offered vs. Requested Due Date - Distribution report as required by the SQM. (RQ5399)

Impact of Change: None.

(11) *Affected Measures:* SA-1 (Georgia, Florida, and Tennessee)

Description of Change: Currently, the percentage reported does not reflect FOCs sent on the same day that the ASR was received. Consistent with the SQM, these FOCs should be included and BellSouth proposes to correct the report. (RQ5492)

Impact of Change: For April 2004, in Georgia, the 12-Month results would change from 81.28% to 96.21%.

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STATE OF SOUTH CAROLINA

COUNTY OF RICHLAND

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CERTIFICATE OF SERVICE

The undersigned, Jeanette B. Mattison, hereby certifies that she is employed by the Legal Department for BellSouth Telecommunications, Inc. ("BellSouth") and that she has caused BellSouth Telecommunications, Inc.'s Proposed August 2004 and Preliminary September 2004 Data Notification Report in Docket No. 2001-209-C to be served upon the following this July 8, 2004:

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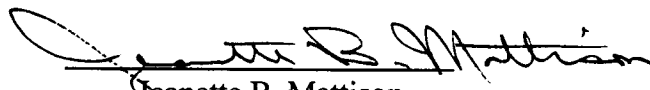
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